EXHIBIT 45

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

DONNA CURLING, *et al.*	
Plaintiffs,	CIVIL ACTION
v.	FILE NO. 1:17-cv-2989-AT
BRAD RAFFENSPERGER, *et al.,*	
Defendants.	

DECLARATION OF DR ERIC D. COOMER

Pursuant to 28 U.S.C. § 1746, I, Dr. Eric D. Coomer, make the following

declaration:

1.

My name is Dr. Eric D. Coomer. I am over the age of 21 years, and I am

under no legal disability which would prevent me from giving this

declaration. If called to testify, I would testify under oath to these facts.

2.

I am the Director of Product Strategy and Security for Dominion Voting

Systems ("Dominion"). I was previously the Vice President of U.S.

Engineering for Dominion, and prior to that, I was the Vice President of

throughout the country since 2016. Other perceived issues raised in the

Texas certification were assertions that the secrecy of the ballot was not

preserved. This is incorrect. All data stored on the ImageCast Precinct

tabulators is randomized. There is no uniquely identifying information stored

in the audit mark, or on the compact flash memory card for any ballot that is

tabulated, whether from the ImageCastX BMD, or from a hand-marked

ballot.

<div align="center">7.</div>

Dominion has worked closely with Georgia election officials on the

rollout of the new system. As part of the development and deployment of

Democracy Suite statewide, no existing components of Georgia's legacy DRE

system is being used. Dominion's Election Management System will

completely replace the GEMS system used in Georgia. No information,

software, or source code from the existing DREs is being utilized.

<div align="center">8.</div>

The Poll Pads are completely replacing the old ExpressPoll units and

no information from the existing ExpressPoll units will be placed into the Poll

Pads. The Poll Pads will instead receive flat text files for each election

containing the then-current voter information from the state's voter-

registration database. Based upon information received from KNOWink's

<div align="center">4</div>

President and CEO, the Poll Pad is certified for use in the following states:

California, Idaho, Indiana, Minnesota, New York, Ohio, Pennsylvania, Texas,

Virginia.

9.

Dominion's optical scanners (ICP) can be used with BMD-marked paper

ballots or hand-marked paper ballots. The ICP units do not interpret the

human-readable (text) portion of either type of ballot. Instead, the ICP units

are programmed to read the QR Code for the BMD ballot or particular

coordinates on hand marked ballot. Please see Exhibit A for a sample of

coordinates on the hand-marked ballot. The target locations are then

correlated to individual choices represented on the ballot. Pre-Logic and

Accuracy Testing (Pre-LAT) is performed each election on every machine to

verify that the target locations on hand-marked ballots, and the barcodes on

BMD-marked ballots correspond correctly to the choices represented on the

ballots and the digital cast-vote-records.

10.

Every ballot (hand-marked, or BMD generated) scanned on a

Democracy Suite tabulator creates a digital image of the front and back of the

ballot. In addition, the tabulators append an AuditMark to each image. The

AuditMark is a text representation of how the tabulator interpreted the

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use the same touch-screen technology. Instead, the ImageCastX BMD uses modern touch-screen technology, similar to an iPhone or Android phone, that does not require regular calibration.

<div align="center">13.</div>

While all computers can be hacked with enough time and access, Dominion is not aware of any situation where an individual used the bar code on one of its units to launch software or to affect the operation of the unit.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 13th day of November, 2019.

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DR. ERIC D. COOMER